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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ELIZABETH HOLMES and RAMESH
"SUNNY" BALWANI,

Defendant.

Case No. 18-CR-00258 EJD

DECLARATION OF VANESSA BAEHR-JONES
IN SUPPORT OF UNITED STATES' OPPOSITION
TO DEFENDANT RAMESH "SUNNY"
BALWANI'S MOTION TO SEVER

[FILED PROVISIONALLY UNDER SEAL
PURSUANT TO COURT ORDER OF JANUARY
13, 2020]

I, Vanessa Baehr-Jones, declare:

1. I am an Assistant United States Attorney (AUSA) representing the United States of America, the plaintiff in this case.

2. Attached hereto as Exhibits 1A-1O are true and correct copies of the [REDACTED]

[REDACTED] which defense counsel served on the government

DECL. OF VANESSA BAEHR-JONES
18-CR-00258 EJD
FILED UNDER SEAL

SEALED BY ORDER
OF COURT

FILED

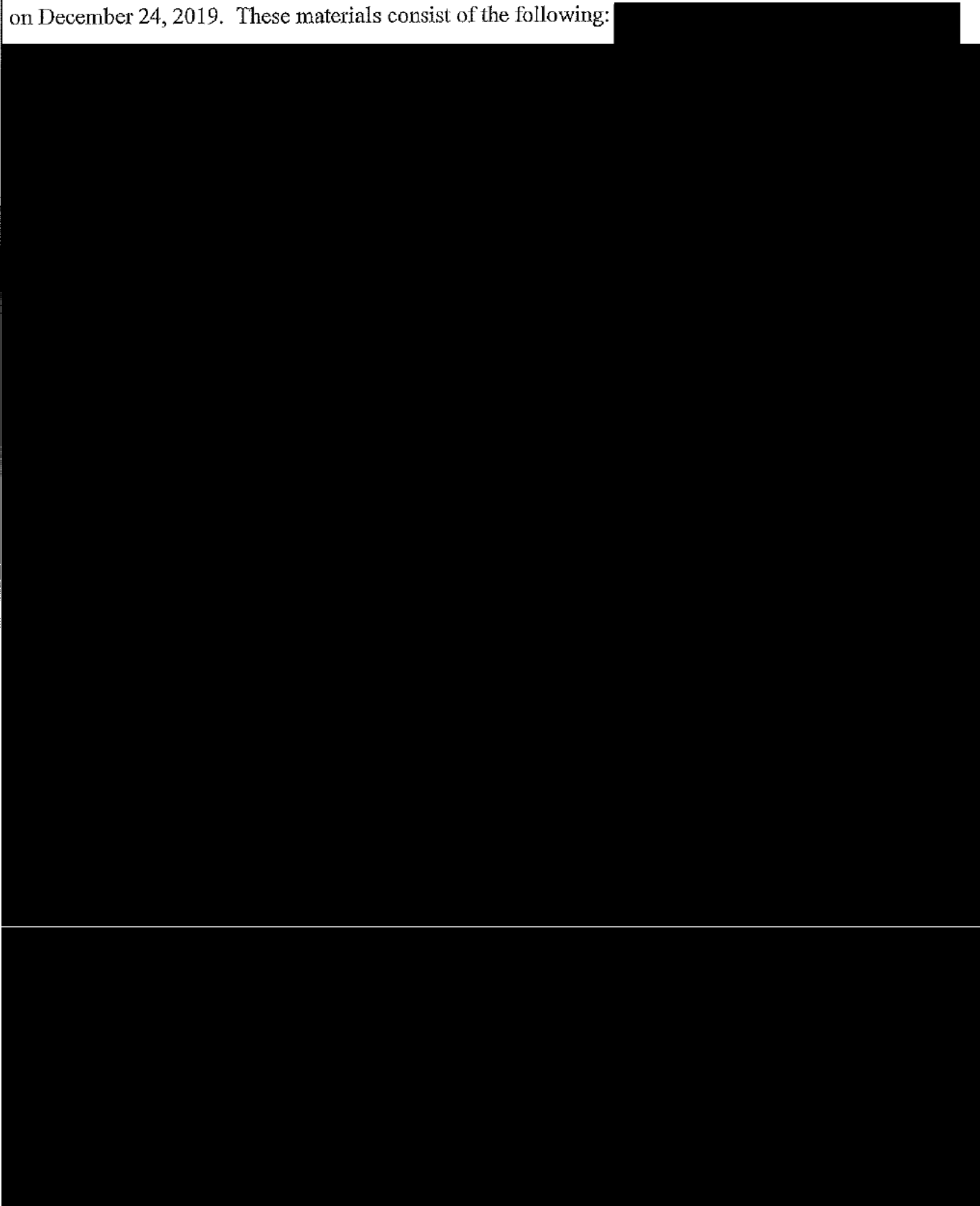
JAN 31 2020

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

314 J

314

1 on December 24, 2019. These materials consist of the following:

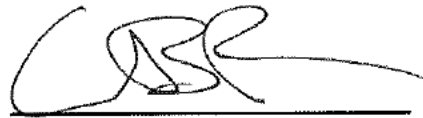


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28 DECL. OF VANESSA BAEHR-JONES
18-CR-00258 EJD
FILED UNDER SEAL

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 6. I declare under penalty of perjury under the laws of the United States of America that the
5 foregoing is true and correct and that this declaration is executed at Oakland, California, on January 31,
6 2020.

7 DATED: January 31, 2020



VANESSA BAEHR-JONES
Assistant United States Attorney

EXHIBITS 1A-10, 2-4

**ENTIRE DOCUMENTS PROVISIONALLY FILED
UNDER SEAL**